**IN THE UNITED STATES DISTRICT COURT**
**FOR THE NORTHERN DISTRICT OF TEXAS**
**ABILENE DIVISION**

| | | |
|---|---|---|
| CLOUD NETWORK TECHNOLOGY USA INC., Plaintiff | § | |
| V. | § | C.A. No. 1:23cv28 |
| RRK TRUCKING INC. Defendant | § | |

**PLAINTIFFS' APPLICATION FOR TURNOVER ORDER**

TO THE COURT:

Plaintiff, Cloud Network Technology USA Inc. ("Cloud"), applies for an order to aid the satisfaction of a judgment in this cause rendered by the Court in favor of Plaintiff Cloud against Defendant RRK Trucking Inc. ("RRK"), and as grounds for the aplication would show as follows:

I.

1. On April 12, 2024, the Court entered a final default judgment in favor of Cloud against Defendant RRK in the amount of $3,094,311.78, prejudgment interest at 8.5% per annum from February 1, 2023, until the date judgment was entered, postjudgment interest at 8.5% from the date the judgment was entered until the judgment is paid in full, and all costs of court.

II.

2. In order to satisfy the judgment, Plaintiff Cloud seeks a turnover order of certain causes of action RRK has against its liability insurance carrier, United Specialty Insurance Company ("Specialty"). The grounds supporting the application for turnover are set forth in Cloud's contemporaneously-filed Brief and Appendix. As set forth therein, the application for turnover may be determined without further notice and hearing to RRK, and without waiting for the expiration of the automatic stay under Fed. R. Civ. P. 62(a). Cloud also seeks reasonable and necessary attorney's fees associated with the turnover in the amount of $3,000.00.

III.

3. Cloud therefore requests that the Court grant its application for turnover order and request for reasonable and necessary attorney's fees, and for such other and further relief, both at law and in equity, to which Cloud may show itself justly entitled.

Respectfully submitted,

/s/ *Robert G. Moll*
ROBERT G. MOLL
(Admitted ND Texas)
Texas Bar No.: 00784622
1903 Blooming Park Lane
Katy, Texas 77450
Telephone: (713) 540-2780
E-mail: texlaw1992@aol.com

**ATTORNEY FOR PLAINTIFF**